Message

From: Russo, Todd [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7431271DED174CFAB2FE664406154CDB-RUSSO, TODD]
Sent: 9/17/2021 7:48:58 PM
To: Pratt, Marirose [Pratt.Marirose@epa.gov]; Rubini, Suzanne [Rubini.Suzanne@epa.gov]; Nowell, Valerie [Nowell.Valerie@epa.gov]; Kemker, Carol [Kemker.Carol@epa.gov]
CC: Palmer, Leif [Palmer.Leif@epa.gov]
BCC: Russo, Todd [Russo.Todd@epa.gov]
Subject: RE: New Indy news

We had a technical call with New Indy today and ORC had a call with New Indy counsel yesterday. We each discussed our concerns about taking the steam stripper offline for eight days for maintenance and routing all condensate to the ASB. Notes from the team's technical call are below. Generally, New Indy believes that they have learned a lot and by monitoring the oxidation reduction potential (ORP) in real time, they can control H2S emissions. They are installing a probe (should be completed today) in the foul condensate hard pipe to monitor the ORP real time. Also, SC DHEC asked New Indy to curtail production levels when the stripper is offline which is discussed in the letter dated 9/17/21 (I forwarded the email with the letter earlier today).

Reason for timeframe of stripper maintenance

- The preparation for the steam stripper maintenance takes 2 days and involves the flushing out, cooling and dismantling of the stripper column (taking off lid and taking out the trays). It also involves a lockout/tagout process for safety.
- Maintenance 3 days - maintenance of the column involves removing and hydro blasting the column trays (22 rows and 3 trays per row) and the inside of the empty column. The maintenance operation will also include the hydro blasting of the 3 pre-heaters, the reboiler, the Fibro filters (it filters the condensate before it enters the stripper column - inlet filter) and the lines that feed the preheaters.
- 2 days to restart - Back online is the reverse of the prep where the unit is reassembled.
- This use to be completed on a yearly cycle under the old process (bleaching). The stripper did have maintenance in May 2021. Since there are a few more streams being collected and sent to the steam stripper than before, there were signs of a need for maintenance. The facility is not sure if the indications for maintenance are a result of sludge buildup or if there is a problem with some trays. There were signs that the steam stripper removal rate was lower. Signs that indicated that the column needed maintenance were lower differential pressure (about 0.5 inches of water column) the normal DP is about 5 inches of water column, and lower temperature in the heat exchangers.
- Tracking the downtime but don't expect excess emissions. Downtime was meant in the 9/15/21, letter, not excess emissions.

ASB

- Condensate will be sent directly to ASB. No.2 recovery boiler is down which reduces production. No.2 boiler is supposed to come back online this Saturday and will figure out the condensate flow rate to ASB once everything is in place. Historically, 850 gal/min is the max rate so will be somewhere under that threshold.

- Feeding hydrogen peroxide into the pipe to help with the condensate and sulfate levels. Also looking to include an Oxidation Reduction Potential (ORP) monitor for ORP of the ASB.
- The hard pipe discharges condensate at about 15 feet below the surface of the ASB and the ASB is 20 feet in depth for the water column with 17 feet of 92% water of watery sludge and about 3-4 feet of free water.
- Dredging of the surface of the ASB is finished and just doing maintenance.
- Adding a second subsurface dredge starting tomorrow morning for the water sludge beneath the surface.
- Plan is to feed peroxide at 50% excess the calculated need. Can feed up to 3 times the amount of peroxide into the ASB to control the H2S. New Indy is confident that any spikes of H2S can be handled by the addition of peroxide and they have back up supplies ready for use.
- Operating the steam stripper at an effective steam ratio of 18% results in stripper maintenance on a yearly basis.
- Lately New Indy has been operating the stripper at higher effective steam ratios (~ 20% to 21%) to account for a drop off in methanol reduction which would result in maintenance every 6 months.
- The June 2021 performance test was done at the same time that remedial actions were taking place in the ASB but had to perform the test within the 180 day window.
- Second dredge will increase the capacity of the ASB to allow for containing any future upset problems.
- Sentry monitor in the ASB monitors the biological levels. The monitor for the hard pipe will look for more of the sulfur related compounds.

Regards,

Todd Russo
Chief, Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. EPA Region 4
Tel: (404) 562-9194

From: Pratt, Marirose <Pratt.Marirose@epa.gov>
Sent: Friday, September 17, 2021 3:48 PM
To: Rubini, Suzanne <Rubini.Suzanne@epa.gov>; Nowell, Valerie <Nowell.Valerie@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Kemker, Carol <Kemker.Carol@epa.gov>
Cc: Palmer, Leif <Palmer.Leif@epa.gov>
Subject: RE: New Indy news

Hi Suzanne,

Yes, that was actually what Valerie and I talked to opposing counsel about yesterday. We called him to let him know EPA's concern about this plan given the recent exceedances that resulted from the black liquor spill. He informed us that New Indy would be conducting real time monitoring of the ASB to make sure that it is not overwhelmed by any additional load and take all necessary precautions, including reducing production or shutting down, if monitoring shows the possibility of increased H2S emissions. New Indy submitted the attached letter to DHEC this morning, confirming this commitment. The letter says that New Indy intends to reduce production initially so that it is not sending any more foul condensate to the ASB than it is currently. If all goes well, it will gradually increase production but "[u]nder no circumstance would New-Indy allow production levels to create undesirable emissions or exceed any applicable limitations."

Please let us know if you have any other questions.

Thanks!
Marirose

Marirose J. Pratt
Senior Air Enforcement Attorney
Air & EPCRA Law Office
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
Phone: 404-562-9023
Fax: 404-562- 9486
pratt.marirose@epa.gov

From: Rubini, Suzanne <Rubini.Suzanne@epa.gov>
Sent: Friday, September 17, 2021 3:36 PM
To: Nowell, Valerie <Nowell.Valerie@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Kemker, Carol <Kemker.Carol@epa.gov>; Pratt, Marirose <Pratt.Marirose@epa.gov>
Cc: Palmer, Leif <Palmer.Leif@epa.gov>
Subject: New Indy news

I was just on the phone with Jackie Dickman from SCDHEC and she mentioned that New Indy is about to take its air stripper off-line for repairs. Did you guys know about that?